

# **S BRANDON SAMPLE**

ATTORNEY AT LAW

Via ECF Filing Only

December 13, 2019

USDC SDNY  
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ELECTRONICALLY FILED  
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DATE FILED: 12/16/2019

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street  
Daniel Patrick Moynihan U.S. Courthouse  
New York, New York 10007

**APPLICATION GRANTED.**

The parties shall file the letter submission by December 18, 2019.

Dated: December 16, 2019  
New York, New York

RE: *United States v. Ross William Ulbricht*, No. 19 Civ. 7512 (LGS) (S.D. N.Y.)  
Extension of Time for Joint Submission on Privilege Waiver

Dear Judge Schofield:



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Ross William Ulbricht (“Ulbricht”), through his counsel Zachary L. Newland, submits this letter to the Court seeking an extension of time to submit any letter submission as directed by the Court’s prior order. (*See Order*, ECF No. 13, 12/4/2019).

We are seeking an extension of the deadline to submit a letter from both parties which is currently set for December 13th. The extension sought would require any submission to be provided no later than next Wednesday December 18, 2019.

The Government consents to this requested extension of time. The parties do not anticipate seeking any further extension of time.

The extension is necessary in order to allow the parties more time to adequately confer on the technical response merited by the Court’s order.

The extension is also necessary due in part to undersigned counsel’s busy docket which included, among other things, travel and oral argument before the Seventh Circuit on December 13th; a December 11th contested telephonic hearing before the Northern District of Alabama; December 16th deadline to submit pre-trial scheduling order in the District of Columbia; and December 16th deadline to submit a reply in support of compassionate release in the District of Rhode Island.

Both Ulbricht and the United States respectfully ask the Court to extend the deadline to provide a submission in compliance with the December 4th Order through December 18th.

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The parties believe that this proposed schedule is appropriate and would ensure that justice is served.

Respectfully submitted,

/s/ Zachary L. Newland  
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cc: All counsel of record, via ECF notification  
Mr. Ross William Ulbricht, via U.S. Mail only  
File